



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

RQ-3

January 29, 1999

Patricia Ford, Treasurer
Service Employees International Union
Political Campaign Committee
1313 L Street, NW
Washington, DC 20005

Identification Number: C00004036

Reference: Amended July Monthly Report (6/1/98-6/30/98), dated 11/17/98

Dear Ms. Ford:

On December 9, 1998, you were notified that a review of the above-referenced report(s) raised questions as to specific contributions and/or expenditures, and the reporting of certain information required by the Federal Election Campaign Act.

The Commission is in receipt of your counsel's letter as well as the letter from SEIU Local 1199's counsel, both dated December 23, 1998. Counsel for SEIU Local 1199 states that a "portion of the permissible funds transferred by Local 1199 to SEIU COPE in June 1998 may have been raised prior to the date that the committees became affiliated in April 1998."

11 CFR 102.6(b)(1) defines a collecting agent as an organization or committee that collects and transmits contributions to one or more separate segregated funds ("SSF") *to which the collecting agent is related*. A collecting agent may be either a committee affiliated with the SSF; the connected organization of the SSF; a subsidiary, branch, division, department or local unit of the connected organization of the SSF; or a local union collecting contributions on behalf of the SSF of any federation with which the local is affiliated.

According to your letters dated November 16 and December 23, 1998, SEIU and Local 1199 became affiliated in April 1998 though this information was not disclosed until an amended Statement of Organization was filed on October 2, 1998 - approximately 4 months after the \$770,714 transfer-in. Prior to April 1998, Local 1199 transferred contributions from its collecting agent account to either its federal or non-

federal account. Then, in June 1998, Local 1199 transferred "\$770,714 as a collecting agent" to SEIU COPE. As noted above, you state that some portion of these funds may have been raised prior to affiliation.

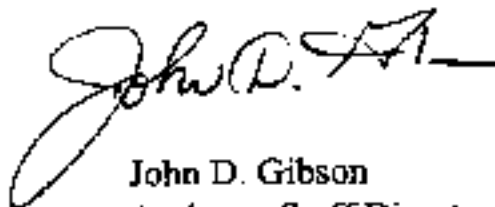
To clarify the public record, please provide the following information:

- how much was raised by Local 1199 prior to the date of affiliation which was transferred to SEIU COPE?
- were the contributors' checks made out to Local 1199 or SEIU COPE?
- what was the total amount of the checks made out to Local 1199?
- for whom were the funds solicited, Local 1199 or SEIU COPE?
- did Local 1199 forward all contributions exceeding \$50 to SEIU COPE within ten days of receipt? If not, how much was forwarded more than ten days after receipt and when was it forwarded?
- did Local 1199 forward all contributions of \$50 or less to SEIU COPE within thirty days of receipt? If not, how much was forwarded more than thirty days after receipt and when was it forwarded?

If this information is not received by the Commission within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions related to this matter, please contact Neil Evans on our toll-free number (800) 424-9530 or our local number (202) 694-1130.

Sincerely,



John D. Gibson
Assistant Staff Director
Reports Analysis Division

